



COUNCIL: 18 July 2018

Report of: Director of Leisure and Environment Services.

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SUBJECT: CLEAN AIR STRATEGY 2018 - CONSULTATION

Wards affected: Borough wide

1.0 PURPOSE OF THE REPORT

1.1 To advise Members of the contents of the Government's Clean Air Strategy 2018 Consultation and agree appropriate responses.

2.0 RECOMMENDATION

2.1 That Members note the contents of the Government's Clean Air Strategy 2018 consultation and agree the proposed responses indicated in Appendix 2.

3.0 BACKGROUND

3.1 On the 23rd May 2018 the Department for Environment Food and Rural Affairs (DEFRA) published a consultation paper outlining the Government's Clean Air Strategy 2018. This consultation is available to view in full via <https://consult.defra.gov.uk/environmental-quality/clean-air-strategy-consultation> and the deadline for responses is the 14th August 2018. It is stated that "this Clean Air Strategy shows how we will tackle all sources of air pollution, making our air healthier to breathe, protecting nature and boosting the economy".

3.2 Following the review of all the comments received it is the intention to utilise them to inform the final Clean Air Strategy and detailed National Air Pollution Control Programme, which are set to be published in March 2019.

3.3 Essentially, although the consultation notes that the levels of recognised pollutants have dropped since 1970, the strategy is about reducing levels even further. This is proposed because there is now a much greater understanding

regarding the effects of air pollution and health and as technology improves, there is a greater chance of solving or reducing problems. There is also greater concern for how indoor air pollution affects people within their homes.

- 3.4 Members will recall that although in general the air quality in West Lancashire is very good, there is a small Air Quality Management Area (AQMA) in Ormskirk, around the Moor Street and Stanley Street Junction. This incorporates 13 residential properties and was declared in 2010. It was declared due to exceedances of the national guideline limit for Nitrogen Oxide/Nitrogen Dioxide (generally called NO_x). The declaration of an AQMA means that the Council needs to produce annual plans for the area, with a view to working towards improvement in air quality. Details of our last plan (approved by DEFRA) were provided by Members Update in Autumn 2017. Road traffic is the major source of NO_x in our AQMA and the proximity of the houses to the road and the amounts of standing traffic contribute to the monitored levels. Whilst the current levels are still above the threshold, they are generally decreasing and it is thought that the AQMA will not be needed within the next decade, if engine efficiency improvements continue to be made, or the volumes of standing traffic reduce.

4.0 AREAS FOR CONSULTATION

- 4.1 The consultation document is split into a number of chapters, namely:
- Understanding the Problem
 - Protecting the Nation's Health
 - Protecting the Environment
 - Securing clean growth and innovation
 - Action to reduce emissions from transport
 - Action to reduce emissions from home
 - Action to reduce emissions from farming
 - Action to reduce emissions from industry
 - Leadership at all levels
 - Progress towards our goals
- 4.2 Under each of these headings there are a broad range of proposals to reduce air pollution. Appendix 1 details all of these proposals, under the relevant chapter.
- 4.3 Appendix 2 details the consultation questions and any proposed responses. Given only some of the proposals are relevant at a local level, it is difficult to provide detailed comments on some elements of the strategy. Further clarity will be received when the above mentioned documents are drafted or published next year. Additionally, some of the questions are aimed at industries which are or will be regulated and it is again difficult to comment in these cases.
- 4.4 The first chapter details the five pollutants that are of concern, these being fine particulate matter (PM_{2.5}), ammonia (NH₃), nitrogen oxides (NO_x), sulphur dioxide (SO₂) and non-methane volatile organic compounds (NMVOCs). It details current levels of pollutants, risks and the need to collate all available monitoring data and make it widely available.
- 4.5 The second chapter starts by detailing "Air pollution is a major public health risk ranking alongside cancer, heart disease and obesity. It causes more harm than passive smoking". This chapter also looks at ensuring health information

regarding air pollution is communicated to the right people, including the vulnerable and those at risk, to allow, for example, choices to be made re exposure and to allow appropriate decision making.

- 4.6 In chapter three the impacts of air pollution on the environment are discussed. The strategy wants to ensure we move away from thinking that pollution is simply the price paid for progress. The Planning process will be used to try to mitigate cumulative impacts of nitrogen deposition.
- 4.7 The fourth chapter looks at driving forward the economy in an environmentally friendly way. This in turn will increase productivity, due to reduced pollution related absences. There is also support for the UK to become global leaders in clean green technologies, for example in relation to zero or ultra-low emission heavy goods vehicles.
- 4.8 Emissions from transport are discussed in the fifth chapter. Emissions of nitrogen dioxides have fallen by almost 27% between 2010 and 2016 and are also at their lowest level since records began. However, transport, including road, shipping, aviation and rail are responsible for 50% of nitrogen oxides, 16% of PM_{2.5}, and 5% of NMVOCs. Essentially the focus here is to move towards lower emission forms of transport. Sixty one local authorities, with the highest levels of NO_x pollution, have been required to investigate what can be done to reduce this pollutant in their areas (this does not include West Lancashire). Shipping, rail, aviation and non-road mobile machinery have all been identified as other polluting sources, with suggestions made to look at improvements in all these areas.
- 4.9 The government objective outlined in chapter six is "to raise awareness of the potential impacts of air pollution at home and ensure that consumers are armed with reliable information enabling them to make informed choices to protect themselves, their families and their neighbours". Open fires and stoves and unsuitable fire wood logs seem to be attracting the most attention in the strategy, especially in relation to PM_{2.5}. From 2022 all new domestic stoves will be required to comply with an efficiency standard. In addition, local authorities will be given powers to reduce the sale of unseasoned wood. Small bundles of logs, principally bought from garage forecourts, are identified as particularly polluting as the energy goes to removing the moisture, which produces smoke, rather than providing heat. The other strand of this issue relates to the NMVOCs that are given off from new furniture, carpets and cleaning materials. Encouragement and advice will be given to ensure that householders are aware to ventilate their properties appropriately.
- 4.10 The provisions relating to Ammonia are discussed in chapter seven. It is now recognised that agriculture has a role to play in relation to air quality. The agricultural sector is the main source of ammonia, accounting for 88% of all emissions in 2016. Agriculture is also responsible for around 51% of methane emissions. Numerous proposals are in the document in relation to ammonia reduction.
- 4.11 In the eighth chapter of the strategy consultation, emissions from Industry are targeted. Since 1990, industrial emissions of nitrogen oxides to air have reduced by 74%, emissions of sulphur dioxide have reduced by 97% and emissions of volatile organic compounds have reduced by 73%. However, industrial emissions

are still responsible for a significant proportion of total UK emissions - 35% of nitrogen oxides, 65% of sulphur dioxides, 27% of particulate matter and 53% of volatile organic compounds in 2016. Significant polluting industrial sectors including energy and refineries, iron and steel, manufacturing, solvents, chemicals and cement production will all be explored with a view to reducing emissions.

- 4.12 The ninth chapter details what the government's legislative approach will cover. They aim to "bring forward legislation at the earliest opportunity in order to secure a more coherent legislative framework for action to tackle air pollution. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem". Local government will be given additional powers, where clean air zones are in force (N.B. not West Lancashire).
- 4.13 The final chapter of proposals details how well the proposals should enable the Government to deliver against the targets set.

5.0 ISSUES FOR WEST LANCASHIRE

- 5.1 Given the document is only a consultation, it is difficult to estimate what legislation and guidance will actually follow. It is clear that this is the biggest review of air quality for a number of years and that the projected reductions are significant. As such there should be corresponding improvements in air quality in some areas. West Lancashire only has a very small air quality issue and as such it is difficult to see how we will be affected, however, industry and particularly farming in West Lancashire could see significant changes in relation to how they control emissions.

6.0 SUSTAINABILITY IMPLICATIONS

- 6.1 The proposals are all aimed at improving air quality. This will have a direct impact on people's health and the environment. In addition, the proposals are aimed at boosting the economy, without impacting on health or the environment.

7.0 FINANCIAL AND RESOURCE IMPLICATIONS

- 7.1 At this stage it is difficult to detail whether there are financial or resource implications for West Lancashire Borough Council. There could be more income from the regulation of industry. Equally, there could be new legislation that local government is given the task of utilising and enforcing. A further report will be produced at the appropriate time.

8.0 RISK ASSESSMENT

- 8.1 The Council will be expected to use any powers available and reduce air pollution, where possible.
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Background Documents

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

Equality Impact Assessment

There is a direct impact on members of the public, employees, elected members and / or stakeholders, therefore an Equality Impact Assessment is required. A formal Equality Impact Assessment is attached as an Appendix to this report, the results of which have been taken into account when undertaking the actions detailed within this Article.

Appendices

Appendix 1 – Clean Air Strategy 2018 Proposals

Appendix 2 – Consultation questions

Appendix 3 - Equality Impact Assessment

Appendix 1 – Clean Air Strategy 2018 Proposals (exerts from DEFRA's Clean Air Strategy 2018).

Chapter 1

- We are investing £10m in improving our modelling, data and analytical tools to give a more precise picture of current and future air quality and the impact of policies to improve it in future.
- We will increase transparency by bringing local and national monitoring data together into a single accessible portal for information on air quality monitoring and modelling, catalysing public engagement through citizen science.

Chapter 2

- We will set a bold new goal to progressively cut public exposure to particulate matter pollution, as suggested by the World Health Organisation. We will reduce PM2.5 levels in order to halve the number of people living in locations where concentrations of particulate matter are above 10 µg/m³ by 2025.
- We will back these goals up with a comprehensive set of new powers designed to enable targeted local action in areas with an air pollution problem.
- We will review our progress in 2022, and we will consider if we should have more challenging milestones towards WHO goals; the new independent statutory body that we are establishing to hold government to account on environmental objectives may, subject to consultation, have a role in the scrutiny of air quality policy and any other strategies relating to air quality.
- We will develop and deliver a personal air quality messaging system to inform the public, particularly those who are vulnerable to air pollution about the air quality forecast and provide clearer information on air pollution episodes and health advice.
- We will improve the information we provide about air pollution, health impacts and the simple actions people can take to reduce their exposure and improve air quality.
- We plan to publish a new set of appraisal tools and accompanying guidance this year to enable the health impacts of air pollution to be considered in every relevant policy decision that is made.
- We will equip health professionals to play a stronger role by working with the Medical Royal Colleges and the General Medical Council to embed air quality into the health profession's education and training. Work with local authorities and directors of public health to equip and enable them to lead and inform local decision-making to improve air quality more effectively.
- We will work with the NHS, hospitals, emergency departments, GPs and local authorities to gather better information on where, when and how patients report and are treated for air quality related health conditions, to help evaluate the effectiveness of actions to improve air quality. This will help meet the recommendations of the recent Chief Medical Officer report on air pollution.

Chapter 3

- Our programme of actions to reduce ammonia emissions from agriculture is set out in Chapter 7.
- We will monitor the impacts of air pollution on natural habitats and report annually so that we can chart progress as we reduce the harm air pollution does to the environment.
- Later this year we will provide guidance for local authorities explaining how cumulative impacts of nitrogen deposition on natural habitats should be mitigated and assessed through the planning system.

Chapter 4

- We will maximise the advantages for UK industry from the global shift to clean growth through leading the world in the development, manufacture and use of technologies, systems and services that tackle air pollution.
- In partnership with UKRI, we will seek ways to support further investment in Clean Air innovation to enable the development of novel technologies and solutions that tackle emissions from industry, vehicles, products, combustion and agriculture and support both improvements in air quality and decarbonisation.
- Future energy, heat and industrial policies will together improve air quality and tackle climate change. Phasing out coal-fired power stations, improving energy efficiency, and shifting to cleaner power sources will reduce emissions of air pollution as well as carbon dioxide. As we phase out oil and coal heating, we will ensure this transition improves air quality wherever possible and cost effective to do so. In addition, the government will conduct a cross-departmental review into the role of biomass in future policy for low carbon electricity and heat, focusing on the air quality impacts. The proposed way forward will be set out in the final Clean Air Strategy.
- We will minimise the air quality impacts of the Renewable Heat Incentive Scheme, for example by tackling non-compliance and consulting on excluding biomass from the RHI if installed in urban areas which are on the gas grid. We will work across central and local government to put a plan in place. In addition, we will consult on making coal to biomass conversions ineligible for future allocation rounds of the contracts for difference scheme.
- We will hold an annual Green Great Britain Week, starting in autumn 2018, as announced in the Clean Growth Strategy. It will consist of events, public engagement and media activity focused on climate and air quality issues across the UK.
- We are seeking evidence on the uses of non-road diesel, mainly in urban areas, considering the air quality impacts and the potential for market distortion. The Treasury has also announced it will review how alternative fuel rates line up with rates of petrol and diesel ahead of Budget 2018.

Chapter 5

Using the comprehensive evidence base on maritime emissions, we will:

- By March 2019, consult on options for new domestic regulations to reduce pollutant emissions from domestic ships. This could be through the application of international emission standards.
- By March 2019 - we will consult on options for extending the current Emissions Control Areas (ECAs) in UK waters.
- By May 2019, all major English ports should produce Air Quality Strategies setting out their plans to reduce emissions across the port estate including ship and shore activities. These plans will be reviewed periodically to establish if the measures implemented are effective or further government action is required.
- By summer 2018, we will introduce a new government-led Clean Maritime Council to bring together different parts of the maritime sector to drive uptake of cleaner technologies and greener fuels.

Rail

- Since 2017, the new Bi-Mode Class 800 – Intercity Express trains have been replacing Class 43 trains, delivering a reduction in emissions by complying with latest emission standards and by switching to electric mode where lines and stations are electrified.
- There are examples of lower emission alternatives in use on the rail network, for example, in Birmingham there are light rail and tram alternatives which are helping to improve local air quality.

- There are also bi-mode rail freight locomotives in service, including the new Class 88s which provide an environmental benefit as they are predominantly designed for electric mode but retain the ability to use diesel on non-electrified lines.
- After poor air quality issues were identified at Birmingham New Street, industry introduced measures including reduced idling time to reduce air pollution.
- We are developing the evidence and testing alternatives to conventional fuels. In particular we are looking at the viability of using alternative fuels including hydrogen fuel cells through research conducted by the Transport Systems Catapult project amongst others. This technology is already in use in Germany and is being developed for use in the UK within the next few years.
- Government will work closely with the decarbonisation task force and industry throughout 2018 and early 2019 to develop a range of measures to tackle decarbonisation and air quality within the wider rail industry including in stations.
- We will develop options to reduce emissions from freight informed, among other sources, by the National Infrastructure Commission's Freight Study.
- Government is sponsoring the independent assessment of air quality at a range of stations to identify if there is a more widespread problem. This assessment will be completed in early 2019.

We will, as appropriate for the type of machinery:

Grant LAs powers to impose minimum emission standards where required to tackle serious air pollution problems;

- Introduce compliance checks, to ensure that the equipment has emissions within a specified tolerance of the regulated maximum emissions levels enforced when it was placed on the market.

● We have also launched last week a call for evidence on the use of NRMM, emissions from NRMM, use of red diesel and the availability of lower emission options. Informed by the responses to the call for evidence, we will take further action to reduce emissions from this source with options that may include but are not limited to:

- Introducing a requirement for in-service compliance checks, to ensure that NRMM equipment emissions remain within agreed levels for their whole lifetime.
- Introducing controls over in-service operations to deter and penalise tampering to intentionally reduce the effectiveness of emission control devices.
- Establishing of a register of NRMM to enable local enforcement including, where appropriate, information of retrofitted equipment and compliance checks.
- Introducing an emissions labelling scheme where it can encourage uptake of lower emission equipment.
- Ensuring that emission standards continue to reflect what is technically achievable as new technologies develop, and drive down emissions of new equipment.

Chapter 6

Domestic burning

- We will legislate to prohibit sale of the most polluting fuels.
- We will ensure that only the cleanest stoves are available for sale by 2022.
- We will give new powers to local authorities to take action in areas of high pollution, bringing legislation into the 21st century with more flexible, proportionate enforcement powers.
- We will work with industry to identify an appropriate test standard for new solid fuels entering the market.

- We will ensure that consumers understand what they can do to reduce their impact from burning.

NMVOCs

- We will work with consumer groups, health organisations and industry to improve awareness of NMVOC build-up in the home, and the importance of effective ventilation to reduce exposure.
- We will work with consumer groups, health organisations, industry and retailers to better inform consumers about the VOC content of everyday products. We will explore a range of options including the development of a voluntary labelling scheme for NMVOC-containing products, and assess its potential effectiveness.
- We will work with consumer groups, health organisations, industry and retailers to promote development of lower VOC-content products and to reduce emissions from this sector.

Chapter 7

Key measures to control ammonia emissions from farming

- covering slurry and digestate stores and manure heaps or using slurry bags.
 - using low emissions techniques for spreading slurries and digestate on land (for example, by injection, trailing shoe or trailing hose).
 - incorporating manures into soils rapidly after spreading (at least within 12 hours).
 - washing down animal collection points soon after use.
 - ensuring that levels of protein in livestock diets are well matched to nutritional needs.
 - switching from urea based fertilisers to ammonium nitrate, which has lower emissions, injecting urea into soil or applying it alongside a urease inhibitor.
- we will provide a national code of good agricultural practice to reduce ammonia emissions.
- we will regulate to reduce ammonia emissions from farming and are seeking views on 3 possible approaches to regulation.
 - we propose to require and support farmers to make investments in the farm infrastructure and equipment that will reduce emissions.
 - we propose that a future environmental land management system should fund targeted action to protect habitats impacted by ammonia.
 - we will continue to work with the agriculture sector to ensure the ammonia inventory reflects existing farming practice and the latest evidence on emissions.
 - we will task a group of independent experts to make recommendations by November 2019 on the maximum limits that should be applied for (organic and inorganic) fertiliser application, taking account of economic efficiency and commitments to reduce ammonia and greenhouse gas emissions from agriculture, and to protect sensitive habitats and water bodies.

Chapter 8

- We will maintain our longstanding policy of continuous improvement in relation to industrial emissions, building on existing good practice to deliver a stable and predictable regulatory environment for business as part of a world-leading clean green economy. This means that we will maintain the existing successful model of integrated pollution control as we leave the EU. But we also want to explore how to evolve this

framework over time, for instance, by exploring the use of market-oriented approaches to further reducing industrial emissions.

- We will consult on how to improve the current framework to make it work better for both the environment, the public and UK industry.
- We will work with industrial sectors to review improvements to date, and to explore opportunities to go further through a series of sector roadmaps that set ambitious standards – moving beyond a focus on minimum standards – to make UK industry world leaders in clean technology and to secure further emissions reductions from industry between 2018 and 2030.
- We will develop a UK approach to determine Best Available Techniques for industrial sectors. We will review existing guidance, in conjunction with devolved administrations, regulators, industry and other interested stakeholders.
- We will review existing guidance to support effective emission controls at smaller industrial sites and consider whether further action is needed to strengthen the current regulatory framework.
- As legislation on medium combustion plants and generators comes into force, we will consider the case for tighter emissions standards on this source of emissions.
- We will close the regulatory gap between the current ecodesign and medium combustion plant regulations to tackle emissions from plants in the 500kW to 1MW thermal input range.

Chapter 9

- We will give Local Government new legal powers to take decisive action in the most polluted areas through local Clean Air Zones that can lower emissions from a wider range of sources than transport alone.
- We will consult on transformative changes to the LAQM system to minimise bureaucracy and reporting burdens, shifting the focus to taking action to clean up local air through strong collaborative local partnerships, and driving stronger local action on reducing PM emissions.
- We will encourage greater public transparency about local air quality to empower local citizens and the air quality decision-makers in their local communities, and provide stronger incentives for local authorities to use their tools and powers.
- We will develop a single, straightforward clean air designation covering Air Quality Management Areas, Clean Air Zones and Smoke Control Areas.
- We will strengthen statutory planning guidance on air quality and help share good practice where it is already happening.
- We will facilitate the sharing of best practice and knowledge between local authorities through webinars and other digital media.

Chapter 10

No proposals contained in this chapter.

Appendix 2 – Consultation questions

Chapter/question number	Question	Proposed response
Chapter 1		
Q1.	What do you think about the actions put forward in the understanding the problem chapter? Please provide evidence in support of your answer if possible.	It is clear that air quality information is held by numerous bodies in different forms. As such collating this information and making it clearer and accessible will be extremely useful.
Q2.	How can we improve the accessibility of evidence on air quality, so that it meets the wide-ranging needs of the public and other interested parties?	Some form of all-encompassing website which is accessible to all and has layers of information for pollutants at local regional and national levels would seem the most appropriate way forward.
Chapter 2		
Q3.	What do you think of the package of actions put forward in the health chapter? Please provide evidence in support of your answer if possible.	Clearly warning and informing the public about air pollution and health is fundamental to allow informed choices and decisions.
Q4.	How can we improve the way we communicate with the public about poor air quality and what people can do?	An option could be to ensure that detailed air quality information becomes part of information that is given as part of weather forecasts especially for affected areas. Given the amount of air-time given to obesity, sugar etc. surely programme makers should be encouraged to try and make air quality advisory programmes for television.
Chapter 3		
Q5.	What do you think of the actions put forward in the environment chapter? Please provide evidence in support of your answer if possible.	We are supportive of these actions.
Q6.	What further action do you think should be taken to reduce the impact of air pollution on the natural environment? Where possible, please include evidence of the potential effectiveness of suggestions.	Unable to comment.
Chapter 4		
Q7.	What do you think of the package	The proposals appear to strike


	of actions put forward in the clean growth and innovation chapter? Please provide evidence in support of your answer if possible.	the right balance.
Q8.	In what areas of the air quality industry is there potential for UK leadership?	Unable to comment
Q9.	In your view, what are the barriers to the take-up of existing technologies which can help tackle air pollution? How can these barriers be overcome?	Unable to comment
Q10.	In your view, are the priorities identified for innovation funding the right ones?	Yes
Chapter 5		
Q11.	What do you think of the package of actions put forward in the transport chapter? Please provide evidence in support of your answer if possible.	The proposals appear to tackle the most polluting issues and look like they are including new areas that have not been targeted before.
Q12.	Do you feel that the approaches proposed for reducing emissions from Non- Road Mobile Machinery are appropriate or not? Why?	Given this is a largely unregulated sector, any proposals are an improvement as this clearly is a source of pollution.
Chapter 6		
Q13.	What do you think of the package of actions put forward to reduce the impact of domestic combustion? Please provide evidence in support of your answer if possible.	It would appear to tackle the issues that are the most polluting.
Q14.	Which of the following measures to provide information on a product's non-methane volatile organic compound content would you find most helpful for informing your choice of household and personal care products, and please would you briefly explain your answer? <ul style="list-style-type: none"> • “A B C” label on product packaging (a categorised product rating for relevant domestic products, similar to other labels such as food traffic light labels) • information on 	User awareness of the problem needs to be raised and a comprehensive media campaign would seem the most appropriate way to do this. Further to this information on a product would assist consumers make decisions at the point of sale and prior to use.

	<p>manufacturer website</p> <ul style="list-style-type: none"> • leaflet at the point of sale • inclusion in advertising campaigns • other option 	
Q15.	What further actions do you think can be taken to reduce human exposure from indoor air pollution?	Given the majority of the general population would be oblivious to being exposed to pollution in their homes, it would appear that a substantial awareness raising campaign will be essential, covering all aspect discussed (combustion, packaging, furniture, use of products etc.).
Chapter 7		
Q16.	What do you think of the package of actions put forward in the farming chapter? Please provide evidence in support of your answer if possible.	We support these proposals.
Q17.	<p>What are your preferences in relation to the 3 regulatory approaches outlined and the timeframe for their implementation:</p> <p>(1) introduction of nitrogen (or fertiliser) limits;</p> <p>(2) extension of permitting to large dairy farms;</p> <p>(3) rules on specific emissions-reducing practices?</p> <p>Please provide evidence in support of your views if possible.</p>	Local authority/EA staff have a great deal of experience in regulating emission sources and as such option 2 would seem appropriate in assisting with consistency. It also follows the polluter pays principle.
Q18.	Should future anaerobic digestion (AD) supported by government schemes be required to use best practice low emissions spreading techniques through certification? If not, what other short-term strategies to reduce ammonia emissions from AD should be implemented? Please provide any evidence you have to support your suggestions.	Unable to comment
Chapter 8		
Q19.	What do you think of the package of actions put forward in the	Legislative controls clearly have an impact, given the huge

	industry chapter? Please provide evidence in support of your answer if possible.	reductions in certain pollutants from industry since the Environmental Protection Act 1990 was introduced. Improved guidance and reduced limits will clearly have an impact.
Q20.	We have committed to applying Best Available Techniques to drive continuous improvement in reducing emissions from industrial sites. What other actions would be effective in promoting industrial emission reductions?	Unable to comment.
Q21.	Is there scope to strengthen the current regulatory framework in a proportionate manner for smaller industrial sites to further reduce emissions? If so, how?	One suggestion would be to include knacker yards under the permitting regime.
Q22.	What further action, if any, should Government take to tackle emissions from medium combustion plants and generators? Please provide evidence in support of your suggestions where possible.	Unable to comment
Q23.	How should we tackle emissions from combustion plants in the 500kW-1MW thermal input range? Please provide evidence you might have to support your proposals if possible.	One option could be to bring the plant under the LA PPC regime and ensure they have permits.
Q24.	Do you agree or disagree with the proposal to exempt generators used for research and development from emission controls? Please provide evidence where possible.	Unable to comment.
Chapter 9		
Q25.	What do you think of the package of actions put forward in the leadership chapter? Please provide evidence in support of your answer if possible.	We are supportive of the proposals.
Q26.	Do you feel that the England-wide legislative package set out in 9.2.2 is appropriate? Why/why not?	Yes it appears appropriate.
Q27.	Are there gaps in the powers available to local government for tackling local air problems? If so,	It is difficult for District Councils to have an impact on air-quality when the source is a

	what are they?	traffic/highway issue as the Highways authority will be the County Council. West Lancashire has a small air quality management area that is an issue solely because of standing traffic, which we have no way of altering. Giving some responsibility to County Councils could assist in situation like this.
Q28.	What are the benefits of making changes to the balance of responsibility for clean local air between lower and upper tier authorities? What are the risks?	There is potentially an improvement for West Lancashire as Lancashire County Council have the highways function. Any additional costs/responsibility falling to Councils should be fully funded.
Q29.	What improvements should be made to the Local Air Quality Management (LAQM) system? How can we minimise the bureaucracy and reporting burdens associated with LAQM?	There seems to be a lot of duplicate information submitted each year. Is it not the time to report on results and progress each year, with 5 yearly substantial reports submitted?
Chapter 10		
Q30.	What do you think of the package of actions in the strategy as a whole?	It is an extremely comprehensive package of measures which appears to cover the most polluting sources.
Q31.	Do you have any specific suggestions for additional or alternative actions that you think should be considered to achieve our objectives? Please outline briefly, providing evidence of potential effectiveness where possible.	No
Q32.	If you have any further comments not covered elsewhere, please provide them here.	

APPENDIX 3

Equality Impact Assessment Form		
Directorate: Leisure and Environment	Service: Community Services	
Completed by: Andrew Hill	Date: 11th June 2018	
Subject Title: Air Quality Consultation		
1. DESCRIPTION		
Is a policy or strategy being produced or revised:	No	
Is a service being designed, redesigned or cutback:	No	
Is a commissioning plan or contract specification being developed:	No	
Is a budget being set or funding allocated:	No	
Is a programme or project being planned:	No	
Are recommendations being presented to senior managers and/or Councillors:	Yes	
Does the activity contribute to meeting our duties under the Equality Act 2010 and Public Sector Equality Duty (Eliminating unlawful discrimination/harassment, advancing equality of opportunity, fostering good relations):	No	
Details of the matter under consideration:	Proposed response to Air Quality Consultation	
<i>If you answered Yes to any of the above go straight to Section 3</i>		
<i>If you answered No to all the above please complete Section 2</i>		
2. RELEVANCE		
Does the work being carried out impact on service users, staff or Councillors (stakeholders):		
If Yes , provide details of how this impacts on service users, staff or Councillors (stakeholders): <i>If you answered Yes go to Section 3</i>		
If you answered No to both Sections 1 and 2 provide details of why there is no impact on these three groups: <i>You do not need to complete the rest of this form.</i>		
3. EVIDENCE COLLECTION		
Who does the work being carried out impact on, i.e. who is/are the stakeholder(s)?	General public	
If the work being carried out relates to a universal service, who needs or uses it most? (Is there any particular group affected more	no	

than others)?	
Which of the protected characteristics are most relevant to the work being carried out?	
Age	No
Gender	No
Disability	No
Race and Culture	No
Sexual Orientation	No
Religion or Belief	No
Gender Reassignment	No
Marriage and Civil Partnership	No
Pregnancy and Maternity	No
4. DATA ANALYSIS	
In relation to the work being carried out, and the service/function in question, who is actually or currently using the service and why?	n/a
What will the impact of the work being carried out be on usage/the stakeholders?	n/a
What are people's views about the services? Are some customers more satisfied than others, and if so what are the reasons? Can these be affected by the proposals?	n/a
What sources of data including consultation results have you used to analyse the impact of the work being carried out on users/stakeholders with protected characteristics?	n/a
If any further data/consultation is needed and is to be gathered, please specify:	n/a
5. IMPACT OF DECISIONS	
In what way will the changes impact on people with particular protected characteristics (either positively or negatively or in terms of disproportionate impact)?	n/a
6. CONSIDERING THE IMPACT	
If there is a negative impact what action can be taken to mitigate it? (If it is not possible or desirable to take actions to reduce the impact, explain why this is the case (e.g. legislative or financial drivers etc.).	n/a
What actions do you plan to take to address any other issues above?	n/a
7. MONITORING AND REVIEWING	
When will this assessment be reviewed and who will review it?	Andrew Hill June 2022